

### **REMARKS/ARGUMENTS**

Reexamination of the captioned application is respectfully requested.

#### **A. SUMMARY OF THIS AMENDMENT**

By the current amendment, Applicants basically:

1. Editorially amend the specification, including insertion of captions (as invited by the first enumerated paragraph of the office action) and insertion of a reference to Fig. 3 (as invited by the third enumerated paragraph of the office action).
2. Call the Examiner's attention to the Information Disclosure Statement (IDS) filed on April 17, 2008, which provided further copies of references alleged illegible (*see* enumerated paragraph 2 of the office action).
3. Amend claims 1 - 5.
4. Cancel claim 6 without prejudice or disclaimer.
5. Add new claims 7 - 11.
6. Respectfully traverse all prior art rejections.

#### **B. THE CLAIMS ARE DEFINITE**

The office action inquires (at the top of page 4) how a functionality can be given from one processor to another processor. The functionality at issue for dependent claim 3 is the Board Relay (BR) functionality. In essence, the Central Processor (CP) gives this BR functionality to an assigned Device Processor (DP) board whereby the CP is able, using the BR functionality, to reach all other DPs just by addressing the assigned DP which is assigned the BR functionality. In other words, a BR functionality which enables the assigned DP to supervise the other DPs on behalf of the CP is delegated or assigned. This explanation of the vesting or assigning the assigned DP with the BR functionality, and use of the BR functionality to supervise the other DPs, is fully explained in the

specification, and should suffice for how a functionality can perform a function (see the last paragraph on page 3 of the office action).

### **C. PATENTABILITY OF THE CLAIMS**

Claims 1-6 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent 6,608,832 to Forslow. All prior art rejections are respectfully traversed for at least the following reasons.

U.S. Patent 6,608,832 to Forslow discloses a communication network wherein a mapper is provided, which can be driven for mapping an individual application flow to one of circuit-switched network and a packet-switched network bearer depending on the quality of service requested for that application flow. Col. 14 and 15 of U.S. Patent 6,608,832 to Forslow refer just to a configuration relay agent 120 which is used to relay the DHCP messages between the DHCP client in the mobile station and the DHCP server in the external network.

In the system of Applicants' amended independent claims, by contrast, a board relay functionality is assigned to a device processor through configuration messages. Relay of packets through the assigned device processor can then occur from the local network device (switch) to other devices, which other devices can further be controlled. Advantageously, Applicants' system is easily scalable. Moreover, it is hence possible to minimize the number of ATM paths or Ethernet connections which have to be set up from the Central Processor to each system node during the system start up and at restart. For the same reason, it is possible to add or remove other boards/shelves at run time.

The office action appears to equate the DHCP server/client structure of Forlow with aspects of Applicants' independent claims. Applicants consider such interpretation of the office action to be incorrect and improper. Moreover, in this regard, Applicants' solution and structure does not even rely on a client/server configuration.

Forlow actually has an arrangement where a client requires a service from a server, while Applicants' decisions (e.g. the control of a newly added shelf which is decided to plug-into the network) are taken locally and autonomously by the Device Processor having Board Relay functionality (BR).

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

#### **D. MISCELLANEOUS**

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,  
**NIXON & VANDERHYE P.C.**

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